

*Loyalty Conversion Systems Corporation v. American Airlines, Inc., et al.***Joint Claim Construction and Prehearing Statement Pursuant to P.R. 4-3****EXHIBIT A****U.S. Patent Nos. U.S. Patent No. 8,313,023 (“the ’023 Patent”) and 8,511,550 (“the ’550 patent”)**

Claim Term	Plaintiff’s Proposed Construction	Defendants’ Proposed Construction
<p>“transfer(s) or conversion(s)” / “conversion or transfer”</p> <p>’023 Patent, claims 31, 39</p>	<p>Plain and ordinary meaning.</p> <p>Intrinsic Evidence: ’023 Patent, Abstract; Figs. 1-3 and corresponding discussion; 2:16-28; 2:40-49; 2:51-59; 2:64-3:12; 3:13-28; 3:46-51; 4:1-7; 4:15-20; 4:21-34; 4:36-43; 4:52-56; 5:3-12; 5:27-31; 5:32-58; claims of ’023 Patent and ’550 Patent; ’023 Patent prosecution history, including Notice of Allowability dated September 19, 2012; Response to Office Action dated September 7, 2012; ’550 Patent prosecution history, including Notice of Allowability dated July 1, 2013</p> <p>Extrinsic Evidence: Plaintiff may offer expert testimony regarding the meaning of this phrase to a person of ordinary skill in the art.</p> <p>Plaintiff further identifies all portions of the intrinsic and extrinsic record identified by any Defendant, including associated context.</p>	<p>“the approximately immediate transfer(s) or conversion(s)/ approximately immediate conversion or transfer”</p> <p>Intrinsic Evidence: ’023 Patent, Figs. 2, 3; 1:20-57; 2:32-48; 3:12-4:51; 5:53-6:12; claims of ’023 Patent and ’550 Patent.</p> <p>Extrinsic Evidence: Defendants may offer expert testimony regarding the meaning of this phrase to a person of ordinary skill in the art.</p>

Claim Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
<p>“the at least one of the one or more computers” / “the one or more nontransitory computer-readable mediums”</p> <p>'023 Patent, claims 31, 39</p>	<p>Plain and ordinary meaning.</p> <p>Intrinsic Evidence: '023 Patent, Abstract; Figs. 1-3 and corresponding discussion; 3:29-45; 3:46-4:20; 4:35-51; 5:59-6:15; claims of '023 Patent; '023 Patent prosecution history, including Notice of Allowability dated September 19, 2012; Response to Office Action dated September 7, 2012; '550 Patent prosecution history, including Notice of Allowability dated July 1, 2013</p> <p>Extrinsic Evidence: Plaintiff may offer expert testimony regarding the meaning of this phrase to a person of ordinary skill in the art.</p> <p>Plaintiff further identifies all portions of the intrinsic and extrinsic record identified by any Defendant, including associated context.</p>	<p>Indefinite</p> <p>Intrinsic Evidence: '023 Patent, claims 31 and 39</p> <p>Extrinsic Evidence: Defendants may offer expert testimony regarding the meaning of this phrase to a person of ordinary skill in the art.</p>
<p>“to convert”</p> <p>'550 Patent, claim 1</p>	<p>Plain and ordinary meaning.</p> <p>Intrinsic Evidence: '550 Patent, Abstract; Figs. 1-3 and corresponding discussion; 2:37-49; 2:56-60; 2:61-3:2; 3:5-15; 3:21-34; 4:1-6; 4:37-40; 4:45-52; 4:60-65; 5:7-11; 5:25-33; 5:53-56; 5:61-67; 6:5-10; claims of '023 Patent and '550 Patent; '023 Patent prosecution history, including Notice of Allowability dated September 19, 2012; Response to Office Action dated September 7, 2012; '550 Patent prosecution history, including Notice of</p>	<p>“to convert in an approximately immediate fashion”</p> <p>Intrinsic Evidence: '550 Patent, Figs. 2, 3; 1:40-2:12; 2:53-3:2; 3:35-5:6; 5:32-58; claims of '023 Patent and '550 Patent.</p>

Claim Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
	<p>Allowability dated July 1, 2013</p> <p>Extrinsic Evidence: Plaintiff may offer expert testimony regarding the meaning of this phrase to a person of ordinary skill in the art.</p> <p>Plaintiff further identifies all portions of the intrinsic and extrinsic record identified by any Defendant, including associated context.</p>	<p>Extrinsic Evidence: Defendants may offer expert testimony regarding the meaning of this phrase to a person of ordinary skill in the art.</p>